

Holston Conference of the United Methodist Church
Maryville, TN
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3215 Tuckaleechee Pike
 Maryville, Tennessee 37803
 20 February 2001

Gary Hartman
 US Department of Energy
 Oak Ridge Operations, EM-912
 Oak Ridge, Tennessee 37831

Dear Sir:

Thank you for agreeing with the Environmental Protection Agency to extend the comment period on the Y-12 Site-Wide Environmental Impact Statement. I attended the public hearing 27 September 1999 but was unable to attend the 25 January 2001 update. I did receive the requested DOE/EIS-0309 Summary report.

As a citizen living within the Y-12 "Ground Zero" area, I have been attempting to learn what DOE is planning to do with this nuclear weapons production plant in the post Cold War era. My questions remain unanswered.

1. Why do we continue to create more nuclear weapons when we dare not use them? The destructive power is so terrifically devastating they are rendered uselessly counterproductive. As a United Methodist, I affirm our General Conference's recently confirmed stance against the development, use and even the holding of these weapons.

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2. Even though DOE would like to move with Alternative 5 (increasing its capacity, constructing a new Highly Enriched Uranium facility and a new Special Materials Complex), it is not compelled to do so. The purpose of this Environmental Impact Statement is to assure the public it is acting on behalf of the common good. If the public sees that this decision is more dangerous than helpful, isn't DOE obliged to respond?

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3. Even though Oak Ridge is a prime military target and even though the EIS plays down actual environmental impacts of contaminants already released, I see no city- nor area-wide plans for dealing with emergencies. The Defense Nuclear Facilities Safety Board has raised numerous serious questions regarding safety controls. When will these be fully addressed?

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4. This is already designated a Superfund Site by the Environmental Protection Agency. When and how will the cleanup proceed?

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I join other citizens of this great democracy in urging you to take into full and honest consideration the comments report submitted by the OAK RIDGE ENVIRONMENTAL PEACE ALLIANCE.

Take heed of Gen. Lee Butler, former head of NATO's nuclear forces, who is now calling for nuclear abolition. Military, political, and religious leaders are raising the chorus. Enough is enough.

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 (cont.)

Comment No. 1

Issue Code: 16

Comment noted. There are no plans or proposals in the Y-12 SWEIS to build new nuclear weapons or to increase the number in the Nation's nuclear weapons arsenal. In accordance with Section 91 of the *Atomic Energy Act*, DOE carries out its mission (i.e., atomic weapons activities) consistent with the consent of and direction from the President and Congress. This consent and direction are contained in the Nuclear Weapons Stockpile Memorandum, which is updated annually. The issue of whether DOE should produce nuclear weapons is beyond the scope of the Y-12 SWEIS.

Comment No. 2

Issue Code: 25

The purpose of the NEPA process is to ensure that accurate environmental studies are performed; that they are done with public involvement; and that public officials make decisions based on an understanding of the environmental consequences. The proposed action and alternatives presented in the Y-12 SWEIS would not be more dangerous, but rather improve the safety and cost effectiveness of Y-12 operations. DOE has made every effort to ensure that the preparation of the Y-12 SWEIS involved the public and interested stakeholders. DOE has encouraged public participation in the process, beginning with the initial scoping meetings and continued it with incorporation of public comments in the Final Y-12 SWEIS. Furthermore, DOE has consulted with a number of other Federal and state agencies during preparation of the Y-12 SWEIS. In addition, the SWEIS has been reviewed by other state and Federal agencies. The NEPA process is established through CEQ regulations (40 CFR Parts 1500-1508). DOE has developed its own implementing regulations for NEPA (10 CFR Part 1021). This SWEIS was prepared in accordance with both sets of regulations, as well as NEPA (42 U.S.C. 4321 et seq.).

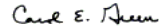
Comment No. 3

Issue Code: 15

Existing Y-12 facilities are safe and comply with appropriate safety and environmental requirements. The proposed HEU Materials Facility and Special Materials Complex would provide more protection from natural phenomena events and accidental releases as well as reduce worker and public exposure to potential health impacts from normal operation.

Instead of purposefully increasing our jeopardy in a time when weapons of mass destruction can be delivered in the back of a truck, consider this the time to decontaminate and decommission the Y-12 nuclear weapons plant. Stop the bombs and begin the cleanup in earnest...for us, our children's children and for God's good earth.

Sincerely,



Carol E. Green
Peace With Justice Coordinator
The Holston Conference of the
United Methodist Church

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(cont.)

Comment No. 3 (cont.)

Issue Code 15

(See also response to Comment No. 26 concerning fire and safety issues on page 217).

Comment No. 4

Issue Code: 16

Over the past several years, DOE has had a very aggressive facility upgrade and clean-up program and has worked with EPA, the states, stakeholders, and the general public to clean up its facilities to acceptable levels. To date, DOE has completed numerous clean-up activities and is aggressively working toward the cleanup of its remaining environmental problems. Actions taken to continue Y-12 weapons support missions, and construction and operation of new facilities for the HEU Materials and Special Materials missions at Y-12 would not be inconsistent with nor impact these ongoing clean-up activities.

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